

1 WILLIAM A. ISAACSON (*Pro hac vice*)  
(wisaacson@paulweiss.com)  
2 PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP  
3 2001 K Street, NW  
Washington, DC 20006  
4 Telephone: (202) 223-7313; Fax: (202) 379-4937

5 STACEY K. GRIGSBY (*Pro hac vice*)  
(sgrigsby@cov.com)  
6 COVINGTON & BURLING LLP  
7 One CityCenter  
850 Tenth Street, NW  
8 Washington, DC 20001  
Telephone: (202) 662-5238

9  
10 DONALD J. CAMPBELL #1216  
(djc@campbellandwilliams.com)  
11 J. COLBY WILLIAMS #5549  
(jcw@campbellandwilliams.com)  
12 CAMPBELL & WILLIAMS  
700 South 7th Street, Las Vegas, NV 89101  
13 Telephone: (702) 382-5222; Fax: (702) 382-0540

14 *Attorneys for Defendant Zuffa, LLC, d/b/a*  
15 *Ultimate Fighting Championship and UFC*

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18 UNITED STATES DISTRICT COURT  
19 DISTRICT OF NEVADA

20  
21 Cung Le, Nathan Quarry, Jon Fitch, Brandon  
Vera, Luis Javier Vazquez, and Kyle  
22 Kingsbury on behalf of themselves and all  
others similarly situated,

23 Plaintiffs,

24 v.

25 Zuffa, LLC, d/b/a Ultimate Fighting  
26 Championship and UFC,

27 Defendant.  
28

Case No.: 2:15-cv-01045-RFB-(BNW)

**SUPPLEMENTAL  
DECLARATION OF W. HUNTER  
CAMPBELL IN SUPPORT OF  
DEFENDANT ZUFFA, LLC'S  
OBJECTION AND REQUEST  
FOR CLARIFICATION OF THE  
COURT'S MINUTE ORDER (ECF  
NO. 782)**

1 I, William Hunter Campbell, declare as follows:

2 1. I am over 21 years old. I have personal knowledge of the facts stated in this  
3 declaration and if called to testify, I could and would competently testify to these facts. I am a  
4 member in good standing of the State Bar of Nevada. I am Chief Business Officer (“CBO”) and  
5 Executive Vice President of defendant Zuffa, LLC (“Zuffa”), d/b/a Ultimate Fighting  
6 Championship® (“UFC”). UFC is a mixed martial arts (“MMA”) promoter. Prior to serving as  
7 Zuffa’s CBO, I was the Chief Legal Officer of Zuffa from 2017 to 2019. Prior to 2017, I  
8 represented Zuffa as outside counsel on several matters.

9 2. I make this supplemental declaration in support of Zuffa’s Objection and Request  
10 for Clarification of the Court’s January 6, 2021 Minute Order, ECF No. 782 (“January 6 Order”).

11 3. Through my role as Zuffa’s CBO and CLO, as well as from my representation of  
12 Zuffa, I am familiar with Zuffa’s practice of maintaining the confidentiality of Zuffa’s financial  
13 information. Zuffa executives and employees keep financial information—including revenue and  
14 compensation information, both on an individual level—private and confidential. Zuffa’s event-  
15 level financials, including compensation and spending information, are considered highly  
16 confidential. This information is not disseminated broadly because Zuffa’s business partners,  
17 including sponsors, venues, and others, could use this information to gain an advantage over  
18 Zuffa in negotiations. I am also familiar with Zuffa’s practice for maintaining confidential  
19 information, financial projections, business analysis, and strategies. Zuffa does not share this  
20 information broadly, and uses it to make decisions about product investment, development, and  
21 new ideas for events and content.

22 4. I understand that the Court is considering unsealing and making public all  
23 documents in this case. In June 2019, I submitted a declaration in this matter explaining that  
24 some of the materials in this case contain Zuffa’s highly sensitive business information, which we  
25 keep private and which, if released, would allow our competitors to gain a competitive advantage.  
26 Decl. of W. Hunter Campbell, ECF No. 665-4; *see also* ECF No. 565-3.

27 5. As of this date, the information referenced in my earlier declaration is still highly  
28 sensitive business information, which, if released would still allow our competitors to gain an

1 unearned competitive advantage.

2 6. On January 11, 2021, I was on a seventeen-hour flight to Abu Dhabi and unable to  
3 execute this document.

4 I declare under penalty of perjury under the laws of the United States of America that the  
5 foregoing facts are true and correct. Executed this 12th day of January, 2021 in Abu Dhabi.

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8 Wm. Hunter Campbell

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